

**UNITED STATES DISTRICT COURT
IN THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

UNITED STATES OF AMERICA)	
)	
)	CRIMINAL NO.: 3:19-CR-593
vs.)	
)	MOTION TO DISCLOSE EVIDENCE
)	OF OTHER CRIMES, WRONGS, OR
ASHLEY COOK,)	ACTS UNDER RULE 404(b) OF THE
<hr style="width: 30%; margin-left: 0;"/>)	FEDERAL RULES OF EVIDENCE

NOW COMES the Defendant in the above-captioned action, acting by and through undersigned Counsel, filing this Motion to Disclose Evidence of Other Crimes, Wrongs, or Acts, Under Rule 404 (b) of the Federal Rules of Evidence. The Defendant would move this Honorable Court to order the Government to notify the Defendant of its intention to use any evidence of other crimes, wrongs, or acts as proof of motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake or accident, or for any other purpose. The Defendant would also move this Honorable Court to require the Government, at the time of disclosure, to specify the particular crime, wrong, or act to be used and the particular theory upon which they contend it is admissible pursuant to Rule 404(b), Fed.R.Evid.

WHEREFORE, having set forth his grounds, the undersigned prays for such Order as is just and proper.

Respectfully submitted,

s/CONNIE BREEDEN
 CONNIE D. BREEDEN
 Attorney at Law
 Federal I.D. # 10467
 Post Office Box 4475
 Columbia, SC 29240
 (803) 255-1010
breedden@sc.rr.com
 ATTORNEY FOR THE DEFENDANT

Columbia, South Carolina
 August 5, 2019